

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

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|--------------------------------------|---|-----------------|
| ALUMINIUM BAHRAIN B.S.C., | x | |
| | : | |
| | : | |
| Plaintiff, | : | |
| -against- | : | 2:08-CV-299-DWA |
| | : | |
| ALCOA INC., ALCOA WORLD ALUMINA LLC, | : | |
| WILLIAM RICE, and VICTOR DAHDALEH, | : | |
| | : | |
| Defendants. | : | |
| | : | |
| | x | |

**CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER
PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendant Victor Dahdaleh ("Mr. Dahdaleh"), by and through his undersigned counsel, respectfully submits this Consent Motion for Extension of Time to Answer plaintiff Aluminium Bahrain B.S.C. ("Plaintiff")'s First Amended Complaint, and in support thereof states as follows:

1. Pursuant to agreement of the parties and an Order dated June 22, 2012, entered by this Court, Mr. Dahdaleh and the remaining defendants are required to file their answers to the Plaintiff's Amended Complaint by July 25, 2012.

2. On July 25, 2012, defendant William Rice and defendants Alcoa Inc. and Alcoa World Alumina LLC (the "Alcoa Defendants") filed consent motions seeking to extend the time for them to answer Plaintiff's Amended Complaint to September 7, 2012, on the basis that they agreed with Plaintiff to extend the answer date as part of a proposed case management schedule.

3. As he informed the Court and the other parties by letter on July 23, 2012, Mr. Dahdaleh has also agreed to the proposed case management schedule, pending the resolution of his two motions filed with this Court.

4. Mr. Dahdaleh's counsel have conferred with Plaintiff's counsel, and Plaintiff has agreed to the same extension of time for Mr. Dahdaleh to file his answer to the Amended Complaint, consistent with the terms of the consent motions filed by Mr. Rice and the Alcoa Defendants and the proposed case management schedule.

WHEREFORE, Mr. Dahdaleh respectfully requests that the Court grant this Motion for Extension of Time to Answer Plaintiff's First Amended Complaint and extend the time for Mr. Dahdaleh to file his answer to the Amended Complaint to September 7, 2012.

Dated: July 25, 2012
New York, New York

Respectfully submitted,

/s/ David J. Berardinelli

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*Attorneys for Defendant
Victor Dahdaleh*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 25th day of July, 2012, a true and correct copy of the foregoing Consent Motion for Extension of Time to Answer Plaintiff's Amended Complaint was filed with Clerk of Court using the CM/ECF system.

/s/ Carrie Baker Anderson